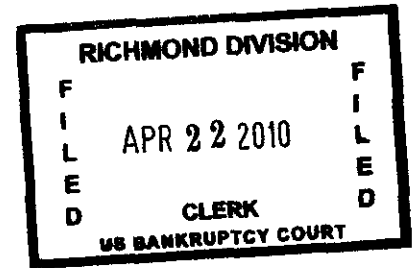




Craig Dean Campbell  
1856 Colt Drive  
Atlanta, GA 30341  
770 936 8373  
April 11, 2010



Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
701 East Broad Street – Room 4000  
Richmond, Virginia 23219

In re:

CIRCUIT CITY STORES, INC.

Chapter 11  
Case No. 08-35653

## Response to the 70<sup>th</sup> Objection

I oppose the relief requested in attached Objection. Circuit City agreed to pay me \$3,250.00 as confirmed in a letter from Circuit City's law firm named Dennis, Corry, Porter & Smith, L.L.P. on June 18, 2008 (See attached). I have also filed a claim for the \$3,250.00 with the United States Bankruptcy Court that was received by the court on December 09, 2008 (see attached).

My claim is justified and I expect to receive the amount of my claim as requested.

If you have any question, please call me at 770 936 8373.

  
Craig Campbell



**COPY**

B 10 (Official Form 10) (12/08)

<b>UNITED STATES BANKRUPTCY COURT</b>		<b>PROOF OF CLAIM</b>
Name of Debtor: <u>Circuit City INC</u>		Case Number: <u>08-35653</u>
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): <u>Craig Campbell</u>		Check this box to indicate that this claim amends a previously filed claim  Court Claim Number: _____ (If known)  Filed on _____
Name and address where notices should be sent: <u>Craig Campbell</u> <u>1856 Colt Drive</u> <u>Atlanta, GA 30341</u>  Telephone number: <u>770-936-8373</u>		
Name and address where payment should be sent (if different from above):    Telephone number: _____		Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars  Check this box if you are the debtor or trustee in this case
1. Amount of Claim as of Date Case Filed: \$ <u>3250.00</u>  If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.  If all or part of your claim is entitled to priority, complete item 5.  Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.  Specify the priority of the claim  Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B)  Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507(a)(4)  Contributions to an employee benefit plan - 11 U.S.C. §507(a)(5)  Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507(a)(7)  Taxes or penalties owed to governmental units - 11 U.S.C. §507(a)(8)  Other - Specify applicable paragraph of 11 U.S.C. §507(a)( )  Amount entitled to priority: \$ _____  *Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment
2. Basis for Claim: _____ (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: _____  3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information  Nature of property or right of setoff: Real Estate      Motor Vehicle      Other Describe: _____  Value of Property: \$ _____ Annual Interest Rate: % _____  Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____  Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim  7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)  DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.  If the documents are not available, please explain: _____		
Date: <u>3/20/08</u> Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.  <u>Craig Campbell</u>		<b>RECEIVED</b>  <b>DEC 09 2008</b>  KURTZMAN CARSON CONSULTANTS

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both - 18 U.S.C. §§ 152 and 3571



Subj: **HI David Confirming Settlement Signed**  
Date: 1/14/2008  
To: [DVanSant@dcplaw.com](mailto:DVanSant@dcplaw.com)

Attached are the signed paper you requested. I faxed and spoke with Eva about removing the case from the trial calendar. I also mailed the Dismissal with Prejudice to the county at the following address:

Magistrate Court  
P.O. Box 246  
Lawrenceville, GA 30046

I spoke with Jerome and he is in agreement with the \$3,000 credit to me along with him paying for the pickup of the old TV and the delivery cost of a new TV if I so choose to purchase a new TV. He also said my prorated service plan refund will be mailed to me. thanks, Craig

In a message dated 1/14/2008 10:28:11 A.M. Eastern Standard Time, [DVanSant@dcplaw.com](mailto:DVanSant@dcplaw.com) writes:

Craig

This will confirm that you have agreed to settle the case you filed against Circuit City in exchange for a gift card from Circuit City for \$3,000. Additionally, Circuit City will assist you in cancelling your existing service contract and you will receive a pro rated sum in the form of a check mailed to you. The estimated pro-rata amount is \$250. Please execute the dismissal attached hereto and have it filed with the court. Please make sure you mail a copy to me as well. Please call me if you have any questions.

David M. Van Sant, Esq.  
For the Firm  
Dennis, Corry, Porter & Smith, L.L.P.  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, Georgia 30305  
(404) 365-0102 Telephone  
(404) 365-0134 Facsimile  
[dvansant@dcplaw.com](mailto:dvansant@dcplaw.com)



LAW OFFICES

**DENNIS, CORRY, PORTER & SMITH, L.L.P.**

3535 PIEDMONT ROAD, NE  
14 PIEDMONT CENTER, SUITE 900  
ATLANTA, GEORGIA 30305-4611

www.dcpaw.com

TELEPHONE 404 365-0102

FACSIMILE 404 365-0134

June 18, 2008

**VIA E-MAIL: [Craigcnatl@aol.com](mailto:Craigcnatl@aol.com)**  
**AND FIRST CLASS MAIL**

Mr. Craig Campbell  
1856 Colt Drive  
Atlanta, GA 30341

Re: Craig Campbell v. Circuit City Stores, Inc.  
In the Magistrate Court of Gwinnett County, Georgia  
Civil Action No. : 07M32682  
Amount of Claim : \$5,956.97  
Our File No. : 778-10270 (SWM)

Dear Mr. Campbell:

I hope you are doing well. On December 6, 2007 you filed a complaint in the Magistrate Court of Gwinnett County against Circuit City in the amount of \$5,956.97. You stated in your Complaint "\$5,956.97 for Plasma TV, a service plan and a wall bracket for the TV." After this filing Circuit City referred this case to our office. From that point forward you and Mr. Van Sant discussed this case in great length and came to an agreement that is clear. The agreement stated Circuit City would give you a store credit of \$3,000.00 in exchange for the defective TV. They also agreed to pick-up the defective TV at no charge and deliver a new TV at no charge if that is what you chose to purchase with the \$3,000.00 store credit. If you chose to purchase other items using the \$3,000.00 store credit that obviously was your choice.

It is my understanding that on Memorial Weekend of this year, which is a very busy weekend for Circuit City, you entered the Circuit City store No. 3222 inquiring about your \$3,000.00 store credit. The manager of the store indicated that he was prepared to provide you with the \$3,000.00 store credit as agreed but that you were no longer willing to return the defective TV. The Circuit City manager stated you said you only agreed to return the defective TV if you then chose to purchase a new TV with the \$3,000.00 store credit. In essence you are asking to keep your defective TV, get reimbursed for the service plan which I believe has already happened and also be given a store credit in the amount of \$3,000.00. Circuit City is in the business of making the customer happy because every customer counts. They are not however willing to have you keep the allegedly defective TV, reimburse you for the service contact and give you \$3,000.00. That is not a reasonable agreement and not what was previously agreed to.





Craig Campbell  
June 18, 2008  
Page 2

As previously stated and agreed to by you, in order for you to receive the store credit of \$3,000.00, arrangements must be made for Circuit City to pick-up the allegedly defective TV. At that point the store credit will be issued and you can chose to purchase whatever merchandise you wish. Again if you choose to purchase a new TV, the delivery of the same is free of charge and covered under the original agreement made between you and Mr. Van Sant. Please give me a call to discuss how you would like to proceed. I appreciate your time and attention.

With kind regards,

A handwritten signature in black ink, appearing to read 'SCOTT W. McMICKLE', with a long horizontal flourish extending to the right.

SCOTT W. McMICKLE  
For the Firm

SWM/tcg

cc: Kevin Halverson, Circuit City



SVC: 1  
PACK NO: 11  
ZOTH OMNI

CASE NO: 08-35653  
PRF 27145

CAMPBELL, CRAIG  
1856 COLT DR  
ATLANTA, GA 30341  
USA

Hearing Date: April 29, 2010, at 2:00 p.m.  
Objection Deadline: April 22, 2010, at 4:00 p.m.

Gregg M. Galardi, Esq.  
Ian S. Fredericks, Esq.  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
One Rodney Square  
PO Box 636  
Wilmington, Delaware 19899-0636  
(302) 651-3000

Dion W. Hayes (VSB No. 34304)  
Douglas M. Foley (VSB No. 34364)  
MCGUIREWOODS LLP  
One James Center  
901 E. Cary Street  
Richmond, Virginia 23219  
(804) 775-1000

- and -

Chris L. Dickerson, Esq.  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
155 North Wacker Drive  
Chicago, Illinois 60606  
(312) 407-0700

Counsel to the Debtors and  
Debtors in Possession

Brian Stark  
804.775.1086

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

- - - - - x  
In re: : Chapter 11  
:   
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)  
et al., :   
:   
Debtors. : Jointly Administered  
- - - - - x

**NOTICE OF DEBTORS' SEVENTIETH OMNIBUS OBJECTION TO CLAIMS  
(DISALLOWANCE OF CERTAIN (I) NO LIABILITY (LEGAL CLAIMS);  
(II) NO LIABILITY (SATISFIED CLAIMS);  
(III) NO LIABILITY (HUMAN RESOURCES CLAIMS); AND  
(IV) NO LIABILITY (MISCELLANEOUS CLAIMS))**

**PLEASE TAKE NOTICE THAT** the above-captioned Debtors  
(the "Debtors") filed the Debtors' Seventieth Omnibus  
Objection to Claims (Disallowance of Certain (i) No  
Liability (Legal Claims); (ii) No Liability (Satisfied  
Claims); (iii) No Liability (Human Resources Claims); and  
(iv) No Liability (Miscellaneous Claims)) (the "Objection")

with the Bankruptcy Court. A copy of the Objection is attached to this notice (this "Notice") as Exhibit 1.

**PLEASE TAKE FURTHER NOTICE THAT** on April 1, 2009, the Bankruptcy Court entered the Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of the Notice of Omnibus Objections (Docket No. 2881) (the "Order"), by which the Bankruptcy Court approved procedures for filing omnibus objections to proofs of claim and requests for allowance and payment of administrative expenses and/or cure claims (collectively, the "Claims") in connection with the above-captioned chapter 11 cases (the "Omnibus Objection Procedures").

Specifically, the Objection seeks to disallow certain claims, including your claim(s), listed below, all as set forth in the Objection.

<u>TO</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Classification As Filed</u>
Campbell, Craig 1856 Colt Dr Atlanta, GA 30341 USA	1433	\$3,250.00	Unsecured

**YOU ARE RECEIVING THIS NOTICE BECAUSE THE PROOF(S) OF CLAIM LISTED HEREIN THAT YOU FILED AGAINST ONE OR MORE OF THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES ARE SUBJECT TO THE OBJECTION. YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION AND OTHER ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

**MOREOVER, PURSUANT TO RULE 3007-1 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA AND THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR A HEARING ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY BY 4:00 P.M. (EASTERN TIME) ON APRIL 22, 2010, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.**

**Critical Information for Claimants**  
**Choosing to File a Response to the Objection**

Who Needs to File a Response: If you oppose the relief requested in the Objection and if you are unable to resolve the Objection with the Debtors before the deadline to respond, then you must file and serve a written response (the "Response") to the Objection in accordance with this Notice.

If you do not oppose the relief requested in the Objection, then you do not need to file a written Response to the Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is **4:00 p.m. (Eastern) on April 22, 2010 (the "Response Deadline")**.

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is **actually received** on or before the Response Deadline by the Bankruptcy Court at the following address:

Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
701 East Broad Street - Room 4000  
Richmond, Virginia 23219

Your Response will be deemed timely served only if a copy of the Response is actually received on or before the Response Deadline by the Debtors' attorneys:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636 Attn: Gregg M. Galardi Attn: Ian S. Fredericks	MCGUIREWOODS LLP One James Center 901 E. Cary Street Richmond, VA 23219 Attn: Dion W. Hayes Attn: Douglas M. Foley
---	---

- and -

SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM, LLP  
155 North Wacker Drive  
Chicago, Illinois 60606  
Attn: Chris L. Dickerson

The status hearing on the Objection will be held at  
**2:00 p.m. (Eastern) on April 29, 2010 at:**

United States Bankruptcy Court  
701 East Broad Street - Courtroom 5100  
Richmond, Virginia 23219

If you file a timely Response, in accordance with the  
Objection Procedures, you do not need to appear at the  
status hearing on the Objection.

**Procedures for Filing a Timely Response and  
Information Regarding the Hearing on the Objection**

**Contents.** To facilitate a speedy and non-judicial  
resolution of a Claim subject to the Objection, any claimant  
filing a Response shall use its best efforts to include the  
following (at a minimum) in its filed Response, to the  
extent such materials are not attached to its proof of  
claim:

- a. a caption setting forth the name of the  
Bankruptcy Court, the name of the Debtors,  
the case number and the title of the  
Objection to which the Response is directed;



- b. the claimant's name and an explanation for the amount of the Claim;
- c. a concise statement, executed by (or identifying by name, address and telephone number) a person with personal knowledge of the relevant facts that support the Response, setting forth the reasons why the Bankruptcy Court should overrule the Objection as to the claimant's claim, including, without limitation (to the extent not set forth in its proof of claim), the specific factual and legal bases upon which the claimant intends to rely in support of its Response and its underlying Claim;
- d. a copy of or identification of any other documentation or other evidence of the Claim, to the extent not already included with the Claim that the claimant presently intends to introduce into evidence in support of its Claim at the hearing; provided, however, that for a Response filed in support of a Claim arising out of a lease of real property, the Response need not attach such lease if the claimant indicates its willingness to provide such documentation upon request;
- e. a declaration of a person with personal knowledge of the relevant facts that support the Response; and
- f. the claimant's address, telephone number and facsimile number and/or the name, address, telephone number and facsimile number of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Address"). If a Response contains Notice Address that is different from the name and/or address listed on the Claim, the Notice Address will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Objection (including all Claims to be

reclassified) and only for those Claims in the Objection.

- g. To the extent such person differs from the person identified pursuant to subsection e, above, the name, address, telephone number, facsimile number, and electronic mail address of the representative of the claimant (which representative may be the claimant's counsel) party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf (collectively, the "Additional Addresses"). Unless the Additional Addresses are the same as the Notice Addresses, the Additional Address will not become the service address for future service of papers.

**Additional Information.** To facilitate a resolution of the Objection, your Response should also include the name, address, telephone number and facsimile number of the party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf. Unless the Additional Addresses are the same as the Notice Addresses, the Additional Addresses will not become the service address for future service of papers.

**Failure to File Your Timely Response.** If you fail to file and serve your Response on or before the Response Deadline in compliance with the procedures set forth in this Notice, the Debtors will present to the Bankruptcy Court an appropriate order granting the relief requested in the Objection without further notice to you.

**Each Objection Is a Contested Matter.** Each Claim subject to the Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Bankruptcy Court will be deemed a separate order with respect to such claim.

**Additional Information**

**Requests for Information.** You may also obtain a copy of the Objection or related documents on the internet, by

accessing the website of the Debtors at  
[www.kccllc.net/circuitcity](http://www.kccllc.net/circuitcity).

**Reservation of Rights.** Nothing in this Notice or the Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you by the Debtors. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date on any grounds or bases. In such event, you will receive a separate notice of any such objections.

Dated: March 26, 2010  
Richmond, Virginia

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
Gregg M. Galardi, Esq.  
Ian S. Fredericks, Esq.  
P.O. Box 636  
Wilmington, Delaware 19899-0636  
(302) 651-3000

- and -

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
Chris L. Dickerson, Esq.  
155 North Wacker Drive  
Chicago, Illinois 60606  
(312) 407-0700

- and -

MCGUIREWOODS LLP

/s/ Douglas M. Foley  
Dion W. Hayes (VSB No. 34304)  
Douglas M. Foley (VSB No. 34364)  
One James Center  
901 E. Cary Street  
Richmond, Virginia 23219  
(804) 775-1000

Counsel for Debtors and Debtors  
in Possession

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